

### **ELEMENT SUMMARY INFORMATION**

**Element:** 4.3.1 Pilot Operating Limitations/Recent Experience

**Purpose of this Element** (Air Carrier's responsibility): To allow pilots to gain operating experience and maintain their currency.

**Objective** (FAA responsibility): To determine if the air carrier's Pilot Operating Limitations/Recent Experience process includes safety attributes.

#### **Inputs:**

- Crewmembers
- Aircraft
- Simulators
- Check Airmen
- FAA Operations Inspectors
- Manuals
- Pilot Records
- Training of Flight Crewmembers
- Appropriate Airman/Crewmember Checks and Qualifications

### **Outputs:**

- Crewmembers who have obtained the required operating experience.
- Appropriate pairing.
- Qualified and current pilots in command and seconds in command.

### **Performance Measures:**

- Crewmembers have been provided operating experience in accordance with CFR 121.434.
- The pilot in command (PIC) conducted all take-offs and landings when required by CFR 121.438(a).
- All pilots met 90-day currency requirements in line operations.
- No air carrier operations were conducted when both pilots had less than 75 hours of line-operating experience.
- All pilots in command used increased landing weather minimums during their first 100 hours of on-line operations.

### SRR:

- 121.434 (a h): Operating experience, operating cycles, and consolidation of knowledge and skills.
- 121.438 (a, b): Pilot operating limitations and pairing requirements.
- 121.439 (a e): Pilot qualification: Recent experience
- 121.652 (a): Landing weather minimums: IFR: All certificate holders.

### Other CFRs and/or FAA Guidance:

- 8400.10, Volume 3, Chapter 2, Section 6, Paragraph 495 A: Level D Flight Simulator.
- 8400.10, Volume 3, Chapter 2, Section 7, Paragraph 525 B: Flight Crew Experience Modules.
- 8400.10, Volume 3, Chapter 2, Section 9, Paragraph 589: Recurrent Differences Training and Currency Events.
- 8400.10, Volume 3, Chapter 3, Section 2, Paragraph 619: Reestablishing Landing Currency of Part 121 Pilots.
- 8400.10, Volume 3, Chapter 3, Section 3, Paragraph 641: NOTE: CFR Part 121 requires that landing currency be reestablished under the supervision of a check airman
- 8400.10, Volume 3, Chapter 3, Section 3, Paragraph 649: Proficiency Check Airman Simulator
- 8400.10, Volume 4, Chapter 2, Section 2, Paragraph 459 A (2)(a, b): Special Approach and Landing Operations.
- 8400.10, Volume 6, Chapter 2, Section 9, Paragraph 279 C: Route, Special Airport, Area Qualification Currency Records Check.

### **SRR SPECIFIC INFORMATION**

SRR	Intent	Inspectors
121.434 (a-h)	To specify the requirements for operating	Certification: Operations
	experience for crewmembers.	Surveillance: Operations
121.438 (a)	To establish take-off and landing restrictions	<i>Certification:</i> Operations
	for low-time seconds in command (SIC).	Surveillance: Operations
121.438 (b)	To establish operational restrictions for the	<i>Certification:</i> Operations
	pairing of low-time pilots.	Surveillance: Operations
121.439 (a)	To specify the 90-day minimum take-off and	<i>Certification:</i> Operations
	landing currency requirements.	Surveillance: Operations
121.439 (b)	To specify the flight maneuvers to reestablish	<i>Certification:</i> Operations
	take-off and landing currency for pilots who	Surveillance: Operations
	failed to meet the 90-day take-off and landing	
	requirements.	
121.439 (c, d)	To specify the requirements to reestablish	<i>Certification:</i> Operations
	take-off and landing currency in a visual	Surveillance: Operations
	simulator.	
121.439 (e)	To specify the requirements for check airmen	Certification: Operations
	to certify pilots who are reestablishing take-	Surveillance: Operations
	off and landing currency.	
121.652 (a)	To require higher landing minimums for	<i>Certification:</i> Operations
	pilots with less than 100 hours as pilot in	Surveillance: Operations
	command (PIC).	

4.3.1 Pilot Operating Limitations/Recent Experience		
SECTION 1 - RESPONSIBILITY ATTRIBUTE		
<b>Objective:</b> To determine if there is a clearly identifiable, qualified, and knowledgeable person who is accountable for the quality of the Pilot Operating Limitations/Recent Experience process.		
To meet this objective, the inspector will accomplish the following tasks:		
1. Identify the person who is responsible for the quality of the Pilot Opera Experience process.	ating Limitations/Recent	
2. Review the description in the Manual that delineates the duties and res	ponsibilities of the person.	
3. Evaluate the person's qualifications and work experience (or resume',	if appropriate).	
4. Review the appropriate organizational chart.		
5. Discuss the Pilot Operating Limitations/Recent Experience process wi	th the person.	
To meet this objective, the inspector will determine and record answers to	the following questions:	
1. Is there a clearly identifiable person who is answerable for the quality of the Pilot Operating Limitations/Recent Experience process?	YES If yes, provide the name: NO If no, explain:	
2. Does the person understand the procedures associated with the Pilot Operating Limitations/Recent Experience process?	YES If no, explain:	
3. Does the person understand the controls associated with the Pilot Operating Limitations/Recent Experience process?	YES If no, explain: NO	
4. Does the person understand the interfaces associated with the Pilot Operating Limitations/Recent Experience process?	YES If no, explain:	
5. Does the person understand the process measurements associated with the Pilot Operating Limitations/Recent Experience process?	YES If no, explain:	
6. Is the responsibility of this position clearly documented in the air carrier's Manual(s)?	YES If no, explain:	
7. Are the qualification standards for this position clearly documented?	YES If no, explain:	
7a Are the qualification standards for this position appropriate for the duties that are assigned?	YES If no, explain:	
8. Does the person meet the qualification standards?	YES If no, explain:	
9. Does the person acknowledge that he/she has responsibility for the Pilot Operating Limitations/Recent Experience process?	YES If no, explain: NO	
10. Does the person know who has authority to establish and modify the Pilot Operating Limitations/Recent Experience process?	YES If no, explain:	

4.3.1 Pilot Operating Limitations/Recent Experience				
SECTION 2 – AUTHORITY ATTRIBUTE				
<b>Objective:</b> To determine if there is a clearly identifiable, qualified, and knowledgeable person with the authority to establish and modify the Pilot Operating Limitations/Recent Experience process.				
То	meet this objective, the inspector will accomplish the following tasks:			
1.	Identify the person who has the authority to establish or modify the Pilo Limitations/Recent Experience process.	t Op	erating	5
2.	Review the description in the Manual that delineates the duties and resp	onsi	bilities	of the person.
3.	Evaluate the person's qualifications and work experience (or resume', if	app	ropriat	re).
4.	Review the appropriate organizational chart.			
5.	Discuss the Pilot Operating Limitations/Recent Experience process with	the	persor	1.
То	meet this objective, the inspector will determine and record answers to t	he fo	ollowin	g questions:
1.	Is there a clearly identifiable person who has authority to establish and modify the air carrier's policies for the Pilot Operating		YES name:	If yes, provide the
	Limitations/Recent Experience process?			If no, explain:
2.	Does the person understand the procedures associated with the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
3.	Does the person understand the controls associated with the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
4.	Does the person understand the interfaces associated with the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
5.	Does the person understand the process measurements associated with the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
6.	Is the authority of this position clearly documented in the air carrier's Manual(s)?			If no, explain:
7.	Are the qualification standards for this position clearly documented?		YES No	If no, explain:
7a	Are the qualification standards for this position appropriate for the duties that are assigned?		YES No	If no, explain:
8.	Does the person meet the qualification standards?		YES No	If no, explain:
9.	Does the person acknowledge that he/she has authority for the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
10.	Does the person know who has the responsibility for the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
11.	Are the procedures for delegation of authority clearly documented for the Pilot Operating Limitations/Recent Experience process?		YES	If no, explain:

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4.3.1 Pilot Operating Limitations/Recent Experience			
SECTION 3 – PROCEDURES ATTRIBUTE			
<b>Objective:</b> To determine if the air carrier has documented procedures for	r accomplishing the Pilot		
Operating Limitations/Recent Experience process.			
To meet this objective, the inspector will accomplish the following tasks:			
1. Review the documented instructions and information related to the P Limitations/Recent Experience process to ensure that they contain whow.	ho, what, where, when, and		
2. Review the FAA Guidance and Specific Regulatory Requirements (S supplemental information section of this SAI.	SRR) included in the		
3. Discuss the Pilot Operating Limitations/Recent Experience process vigain an understanding of the procedures.			
4. Observe the Pilot Operating Limitations/Recent Experience process t procedures.	to gain an understanding of the		
To meet this objective, the inspector will determine and record answers to	to the following questions:		
1. Do written procedures exist to achieve the desired result of the Pilot Experience process:	Operating Limitations/Recent		
1.1 Do written procedures exist to retain recency of experience and currency records until they are superseded? [SRR 121.434 (a); 121.438 (a-b); 121.652(a)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.2 Do written procedures exist to archive initial qualifications of crewmember records? [SRR 121.434 (a); 121.438 (a-b); 121.652 (a)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.3 Do written procedures exist To provide crewmembers with the operating experience necessary to serve as a required crewmember? [SRR 121.434 (a - h)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.4 Do written procedures exist to allow pilots to maintain 90-day recency of experience? [SRR 121.439 (a-e)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.5 Do written procedures exist to reestablish take-off and landing currency for pilots who failed to meet the 90-day recency of experience (to include simulators, if applicable)? [SRR 121.439 (a-e)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
2. Do the procedures identify: who, what, where, when and how?	☐ YES If no, explain: ☐ NO		
3. Are the procedures in compliance with the CFR(s)?	YES If no, explain:		

4.3.1 Pilot Operating Limitations/Recent Experience				
SI	ECTION 3 – PROCEDURES ATTRIBUTE			
4.	Do the procedures conform to other written guidance (E.g., Operations Specifications, FAA Orders, Airworthiness Directives, Advisory Circulars, Handbook Bulletins, Directives, and Manufacturer's Recommendations)?		YES NO	If no, explain:
5.	Does the air carrier have the resources to support the written procedures for the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:
6.	If alternate procedures exist for use during irregular conditions, do they achieve the same desired results as the primary procedures so that an equivalent level of safety is maintained? (E.g., a manual system used as a result of equipment failure.)			If no, explain:  No alternate procedures for this element
7.	Are the procedures published in different manuals relating to the Pilot Operating Limitations/Recent Experience process consistent?		YES No	If no, explain:
8.	Does the air carrier have a documented method for assessing the impacts of procedural changes to the Pilot Operating Limitations/Recent Experience process?		YES No	If no, explain:

4.3.1 Pilot Operating Limitations/Recent Experience				
SECTION 4 – CONTROL ATTRIBUTE				
Objective: To determine if checks and restraints are designed into the Pilot Operating				
Limitations/Recent Experience process to ensure a desired result is achie				
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To meet this objective, the inspector will accomplish the following tasks:				
1. Review the documented instructions and information related to the P Limitations/Recent Experience process.	ilot Operating			
2. Review the FAA Guidance and Specific Regulatory Requirements (S supplemental information section of this SAI.	SRR) included in the			
3. Discuss the Pilot Operating Limitations/Recent Experience process v gain an understanding of the controls.	with appropriate personnel to			
4. Observe the Pilot Operating Limitations/Recent Experience process t controls.	to gain an understanding of the			
To meet this objective, the inspector will determine and record answers to	to the following questions:			
1. Are the following checks and restraints built into the Pilot Operating Limitations/Recent Experience process:				
1.1 Does the air carrier have a written policy requiring the pilot in command to perform all take-offs and landings under the conditions specified in 121.438 (a)?	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.2 Does the air carrier have a documented method to ensure that pilots with less than 100 hours as pilot in command (PIC) use higher landing minimums? [SRR 121.652 (a)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.3 Does the air carrier have a documented method to ensure that low-time pilots are not paired without operations specifications approval? [SRR 121.438 (b)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.4 Does the air carrier have a documented method to inform the pilot in command (PIC) when he/she is paired with a low-time second in command? [SRR 121.438 (a)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.5 Does the air carrier have their check airmen certify the qualification and proficiency of pilots who are reestablishing take-off and landing currency? [SRR 121.439 (e)]	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.6 Does the air carrier require authorized signatures to be used when verifying the operating and recency experience of crewmembers?	☐ YES If no or N/A, explain: ☐ NO ☐ N/A			
1.7 Does the air carrier have mechanisms in place for tracking and flagging 90-day recency of experience? [SRR 121.439 (a)]	YES If no or N/A, explain: NO			

4.3.1 Pilot Operating Limitations/Recent Experience				
SECTION 4 – CONTROL ATTRIBUTE				
1.8 Does the air carrier have mechanisms in place to identify and track low-time pilots? [SRR 121.438 (b)]	☐ YES ☐ NO ☐ N/A	If no or N/A, explain:		
2. Do the checks and restraints ensure the desired result is achieved for the Pilot Operating Limitations/Recent Experience process?	☐ YES ☐ NO	If no, explain:		
3. Does the air carrier have a documented method for assessing the impacts of any changes made to checks and restraints in the Pilot Operating Limitations/Recent Experience process?	☐ YES ☐ NO	If no, explain:		
4. Does the air carrier have the resources to support the checks and restraints for the Pilot Operating Limitations/Recent Experience process?	☐ YES ☐ NO	If no, explain:		

4.3.1 Pilot Operating Limitations/Recent Experience			
SECTION 5 - PROCESS MEASUREMENT ATTRIBUTE			
Objective: To determine if the air carrier measures and assesses the Pil Experience process, to identify and correct problems or potential problems.	lot Operating Limitations/Recent		
To meet this objective, the inspector will accomplish the following task.	s:		
1. Review the documented instructions and information related to the Limitations/Recent Experience process.	Pilot Operating		
Discuss the Pilot Operating Limitations/Recent Experience process gain an understanding of the process measures.	with appropriate personnel to		
3. Observe the Pilot Operating Limitations/Recent Experience process process measures.	s to gain an understanding of the		
To meet this objective, the inspector will determine and record answers	s to the following questions:		
1. <deleted></deleted>			
2. Does the air carrier's Pilot Operating Limitations/Recent Experience process measurements?	re process include the following		
2.1 Does the air carrier record instances when their pilots in command lapse in currency?	YES If no or N/A, explain: NO N/A		
2.2 Does the air carrier conduct trend analyses of pilots in command (PIC) who lapse in recency of experience?	YES If no or N/A, explain: NO N/A		
2.3 Does the air carrier record the number of low-time pilots in the flight crew data base who were not identified as low-time?	YES If no or N/A, explain: NO N/A		
3. Does the air carrier document their process measurement methods and results?	YES If no, explain: No		
4. Are the air carrier's process measurement methods effective?	YES If no, explain: No		
5. Does the air carrier use their process measurement results to improve their programs?	YES If no, explain:		
6. Are the process measurement results accessible to the FAA?	YES If no, explain:		
7. Does the organization that conducts the process measurement have direct access to the person with responsibility for the Pilot Operating Limitations/Recent Experience process?	YES If no, explain: No		
8. Does the air carrier have the resources to support the process measurement for the Pilot Operating Limitations/Recent Experience process?	YES If no, explain:		

4.3.1 Pilot Operating Limitations/Recent Experience			
SECTION 6 – INTERFACES ATTRIBUTE			
<b>Objective:</b> To determine if the air carrier identifies and manages the interactions between the Pilot Operating Limitations/Recent Experience process and the other element processes within the air carrier organization.			
To meet this objective, the inspector will accomplish the following tasks:			
1. Review the documented instructions and information related to the P Limitations/Recent Experience process.	-		
2. Discuss the Pilot Operating Limitations/Recent Experience process v gain an understanding of the interfaces.			
3. Observe the Pilot Operating Limitations/Recent Experience process t interfaces.	to gain an understanding of the		
To meet this objective, the inspector will determine and record answers a	to the following questions:		
1. Are the following interfaces identified for the Pilot Operating Limita process:	tions/Recent Experience		
1.1 <deleted></deleted>			
1.2 Airman Duties/Flight Deck Procedures (Element 3.1.3)	YES If no or N/A, explain: NO N/A		
1.3 Training of Flight Crewmembers (Element 4.2.3)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.4 Simulators/Training Devices (Element 4.2.8)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.5 Outsource Crewmember Training (Element 4.2.9)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.6 Appropriate Airman/Crewmember Checks and Qualifications (Element 4.3.2)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.7 Use of Approved Routes, Areas, and Airports (Element 5.1.6)	☐ YES If no or N/A, explain: ☐ NO ☐ N/A		
1.8 Scheduling/Reporting System (Element 6.1.1)	YES If no or N/A, explain: NO		

4.3.1 Pilot Operating Limitations/Recent Experience		
SECTION & INTERFACES ATTRIBUTE		
SECTION 6 – INTERFACES ATTRIBUTE  1.9 Director of Safety (Element 7.1.3)	YES If no or N/A, explain:	
1.9 Director of Sufety (Element 7.1.3)	☐ YES If no or N/A, explain:	
	□ N/A	
1.10 Chief Pilot (Element 7.1.5)	YES If no or N/A, explain:	
	No	
	□ N/A	
1.11 Safety Program (Element 7.2.1)	☐ YES If no or N/A, explain:	
	□ No	
	□ N/A	
1.12 Manual Currency (Element 2.1.1)	☐ YES If no or N/A, explain:	
	□ No	
	□ N/A	
1.13 Content Consistency Across Manuals (Element 2.1.2)	☐ YES If no or N/A, explain:	
	□ No	
	N/A	
1.14 (Manual) Distribution (Element 2.1.3)	YES If no or N/A, explain:	
	□ No	
	□ N/A	
1.15 (Manual) Availability (Element 2.1.4)	YES If no or N/A, explain:	
	No	
2. List any additional interfaces identified:	□ N/A	
2. List any additional interfaces identified.		
3. Are there written procedures for the use of air carrier personnel in	YES If no, explain:	
the application of these interfaces?	No	
4. Are there controls to ensure that interfaces occur?	YES If no, explain:	
	□ No	
5. Are the interfaces between the Pilot Operating Limitations/Recent	☐ YES If no, explain:	
Experience process and other processes treated consistently in the	□ No	
Manual(s)?		